

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

READING ROCK NORTHEAST, LLC	:	
	:	Civil Action
Plaintiff,	:	Case No. <u>1:20-CV-5728</u>
v.	:	
WILLIAM N. RUSSELL, III	:	
and	:	
RUSSELL CAST STONE, INC.	:	
Defendants.		

Motion to Withdraw as Counsel

Joseph J. Pangaro (“Movant”) hereby files this Motion for Leave to Withdraw as Counsel to Plaintiff Reading Rock Northeast, LLC, and states as follows:

1. Movant entered his appearance on approximately May 8, 2020.
2. On May 18, 2021, Movant will be leaving the firm of Duane Morris LLP.
3. Duane Morris LLP, through Patrick Kearney, Esq., and Stagnaro, Saba & Patterson Co., LPA, through Jeffrey M. Nye, Esq., will continue to represent Plaintiff.
4. Movant respectfully requests that the Court grant his Motion to Withdraw and enter an Order directing the clerk to terminate Movant’s association from this matter on the Court’s CM/ECF system.

WHEREFORE, for the foregoing reasons, it is specifically requested that this Court enter an order granting the Motion to Withdraw as Counsel of Joseph J. Pangaro, and directing the clerk to remove his association from this matter on the Court’s ECF system, and such other and further relief as this Court deems just, proper and equitable.

Respectfully submitted,

/s/ Joseph J. Pangaro_____

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CERTIFICATE OF SERVICE

I, Joseph J. Pangaro, certify that on May 17, 2021, I caused the foregoing Motion to Withdraw as Counsel to be filed on all counsel of record through the Court's electronic filing system.

Respectfully submitted,

/s/ Joseph J. Pangaro_____

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